

**SUPPORT DOCUMENT
for the
Air Operating Permit
issued to**

**Weyerhaeuser Company
Cosmopolis Pulp Mill
P. O. Box 1000
Cosmopolis, WA 98537**

State of Washington
DEPARTMENT OF ECOLOGY
300 Desmond Drive
P.O. Box 47600
Olympia, Washington 98504-7600

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Introduction

This Operating Permit Support Document fulfills the operating permit rule "Statement of Basis" requirement and explains particular portions of the air operating permit for the Weyerhaeuser-Cosmopolis Pulp Mill.

This document is not part of the operating permit for Weyerhaeuser-Cosmopolis Pulp Mill. Nothing in this document is enforceable against the Permittee, unless otherwise made enforceable by permit or order.

Statement of basis

When the Department of Ecology issues a draft operating permit, it is required to provide a statement that sets forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions, [WAC 173-401-700(8)].

Assuring compliance with all applicable requirements

An operating permit must contain terms and conditions that assure compliance with all applicable requirements at the time of permit issuance [WAC 173-401-600(1)]. The permit was issued on November 15, 2004. It was written so that it assured compliance with all of the applicable requirements in effect at the date of issuance. On May 19, 2005, Order No. 2484 AQ-05 was issued allowing the company to monitor particulate from the recovery stack quarterly. On the date of issuance, Order No. 2484 became an applicable requirement. The permit is being modified to include this applicable requirement.

This permit modification changes the frequency of particulate testing, from monthly to quarterly, so long as monitoring shows compliance with permitted limits. It also adds authorities that were previously omitted from the Introduction and Legal Authority page. No other modification of the permit is being made.

Monthly particulate source testing has been imposed on the combined recovery stack through orders for controlling emissions. From 1990 to present except for 1998, particulate stack tests indicate that the probability of exceeding the particulate limit, given the amount of emission monitoring and the control configuration, is very low. The results of this data on the stack tests showed that 99 percent of the Method 5 particulate test results were less than 84 percent of the particulate limit. Ecology considers that the quarterly particulate test frequency sufficient to indicate continuous compliance. A summary of the historical emissions testing results which served as the basis for determining the frequency of monitoring is included in this document as Appendix A.

Compliance with the conditions in the permit is deemed to constitute compliance with applicable requirements as contained in the permit on which the terms and/or conditions are based, as of the date that the permit is issued. [WAC 173-401-640(1)]

Application

Ecology received an application for Title V permit modification on August 1, 2005 requesting the permit be modified. The application was determined to be complete on August 1, 2005.

Appendix A Historical Emission Unit Source Test Data

